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Of Counsel for Novartis Pharmaceuticals Corporation (Pro Hac Vice Pending)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

)	
)	
NOVARTIS PHARMACEUTICALS)	
CORPORATION,)	
)	
Plaintiff,)	Civil Action No.: _____
)	
v.)	
)	
ALISHA ALAIMO,)	
)	
Defendant.)	

**[PROPOSED] ORDER TO SHOW CAUSE
WITH TEMPORARY RESTRAINTS**

THIS MATTER having been opened to the Court by Plaintiff Novartis Pharmaceuticals Corporation (“Plaintiff” or “Novartis”), through its counsel, Epstein Becker & Green, P.C. (James P. Flynn, Esquire, appearing), by way of a Motion for a Temporary Restraining Order seeking an Order to Show Cause with Temporary Restraints against Defendant Alisha Alaimo (“Defendant”); and it appearing to the Court that Plaintiff has served copies of its Complaint,

Motion, Memorandum of Law, and all supporting papers upon Defendant; and the Court having considered the supporting papers; and other good cause having been shown:

It is on this ____ day of _____, 2017, HEREBY ORDERED AS FOLLOWS:

1. Pending further Order of the Court, Defendant Alisha Alaimo shall be restrained from:

(a) Violating the noncompetition provision of her Agreement with Novartis, including but not limited to, being employed by, or otherwise providing services to, Biogen, Inc., and/or any of its related entities, at any time before February 2, 2018 or any later date that the Court orders, in any role involving drugs for the treatment of neuroscience related illnesses;

(b) Violating the non-solicitation provision of her Agreement with Novartis, including but not limited to, directly or indirectly soliciting or encouraging any person to leave his or her employment with Novartis, or assisting in any way with the hiring of any Novartis employee by another company; and

(c) Violating the confidentiality provision of her Agreement with Novartis, including but not limited to, by using or disclosing any confidential or proprietary information or trade secrets of Plaintiff.

It is further ORDERED that:

1. Defendant shall appear in this Court, located at 50 Walnut Street, Newark, NJ, Courtroom _____, on the _____ day of _____ 2017, and show cause why an Order should not be issued converting the Temporary Restraints set forth above into a preliminary injunction.

2. Defendant shall file and serve a written response to this Order to Show Cause with proof of service upon Plaintiff by the ____ day of _____ 2017.

3. Plaintiff shall file and service a written reply to Defendant's response with proof of service by ____ day of _____ 2017.

4. Plaintiff shall not be required to post a bond.

5. The parties may begin discovery forthwith and notwithstanding any other time frames stated in the Federal Rules of Civil Procedure and related Local Rules of this District depositions may be taken on 5 business days' notice, documents demands responded to and documents produced within 10 business days after service of the demand and answers to interrogatories served within 10 business days after service of the interrogatories.

It is so Ordered.

By the Court:

(_____, J.)